

**EXHIBIT J TO THE JUNE 26, 2008
DECLARATION OF GREGORY I. RASIN, ESQ.**

1

2 UNITED STATES DISTRICT COURT

3 SOUTHERN DISTRICT OF NEW YORK

4 JANNIE PILGRIM, GIOVANNA HENSON, JESAN

5 SPENCER and BRENDA CURTIS,

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7 Plaintiffs,

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- against - CASE NO.: 07CIV 6618.

9 THE McGRAW-HILL COMPANIES, INC.,

10

11 Defendant.

12 ORIGINAL

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14 DEPOSITION OF VLADIMIR STADNYK, taken by

15 Plaintiffs, pursuant to Notice on Wednesday, May 7,

16 2008, commencing at 9:45 a.m., before Chandra D.

17 Brown, a Registered Professional Reporter and Notary

18 Public within and for the State of New York.

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2 superior asked my business unit to look into either
3 reviving or disposing of that business unit.

4 Q Who was your direct supervisor?

5 A Hendrick Kranenburg.

6 Q Now, why was your position changed to
7 executive managing director, rating services group?

8 Was that a promotion?

9 MR. RASIN: Objection.

10 MR. SOLOTOFF: I'm sorry. I'll rephrase
11 it.

12 Q Was that a promotion?

13 MR. RASIN: Was what a promotion?

14 Q Was you becoming executive managing
15 director at rating services group a promotion?

16 A No.

17 Q In your capacity as executive managing
18 director of rating services group, were you
19 considered a general manager?

20 A Yes.

21 Q What changes, if any, took place in your
22 job duties and responsibilities after August 2005;
23 regardless of title?

24 A I was promoted to head a larger business
25 unit after my immediate boss moved on to another

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2 position at McGraw-Hill.

3 Q Who was your immediate boss who moved on?

4 A Rik Kranenburg.

5 Q That was Mr. Kranenburg?

6 A Correct.

7 Q Although you were promoted to head a

8 larger business unit after August 2005, you remained
9 in your original office on the 45th floor, correct?

10 A Correct.

11 Q You stayed in that office until

12 January 2008, correct?

13 A Correct.

14 Q While you were executive managing director
15 of security services, did you have any personal
16 assistants or office managers who worked for you?

17 A Yes.

18 Q Prior to August 2005?

19 A. Yes.

20 Q And who was that?

21 A Prior to August 2005, my most recent
22 administrative assistant was Brenda Curtis.

23 And prior to Brenda Curtis was Beatrice
24 Granberg.

25 Q Beatrice?

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2 A Correct.

3 Q - What was the day you started as the
4 executive managing director of data information
5 services?

6 A I don't recall the exact date. Some time
7 during August of 2005.

12 A Brenda Curtis was my administrative
13 assistant when I was the executive managing director
14 of security services.

15 Q Who became your administrative assistant
16 after you became executive managing director of data
17 information services?

18 A Ecri Gutierrez.

19 Q Can you please spell that for the Court
20 Reporter, please?

21 A No, I can't.

22 Q What's your best guess?

23 E-C-C-R-I --

24 A No. E-C-R-I -- it's Ecricilla Gutierrez,
25 G-U-T-I-E-R-R-E-Z.

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2 Q Okay.

3 She became your administrative assistant
4 after you became executive managing director of data
5 information services, correct?

6 A Correct.

7 Q Did Ms. Ecri Gutierrez fill the cubicle
8 that Brenda Curtis filled after Brenda Curtis
9 left --

10 MR. RASIN: Objection.

11 Q -- McGraw-Hill?

12 A Yes.

13 Q Who hired Ecri Gutierrez as your
14 administrative assistant?

15 A I did.

16 Q When did you make that decision to hire
17 her as your administrative assistant?

18 A I don't recall the specific date.

19 Q Was that a day before, a week before, two
20 weeks before she took the position?

21 A I don't recall.

22 O Did you interview her for that position?

23 A I knew Eciri Gutierrez previously. There
24 was no need for interviewing.

25 Q How did you know her previously?

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2 A She was my immediate supervisor's
3 administrative assistant.

4 Q Your immediate supervisor was Hendrick
5 Kranenburg?

6 A Correct.

7 Q What document, if any, would reflect the
8 date that you made that decision to hire Ecri
9 Gutierrez as your administrative assistant?

10 A I don't know.

11 Q Well, is there a transfer-of-employment
12 type position form, or anything like that?

13 A There may be.

14 Q Is that something that you would sign or
15 have signed for you?

16. A Correct.

17 Q Which one?

18 Something you would sign?

19. A Either way.

20 Q In transferring Ecri Gutierrez to becoming
21 your administrative assistant, did you coordinate
22 that with Human Resources?

23 A Yes.

24 Q Who at Human Resources did you communicate
25 that with or communicate with?

1 V. Stadnyk.

2 MR. RASIN: Objection.

3 Direct him not to answer.

4 Q Prior to Ms. Curtis being terminated, did
5 Ms. Curtis complain to you about discrimination in
6 the workplace?

7 A No.

8 Q Who was it that Brenda Curtis was working
9 with whom she was supervising as the office
10 manager/administrative assistant?

11 MR. RASIN: Objection.

12 Direct him not to answer.

13 Q That employee with whom Ms. Curtis worked
14 with, did she complain about discrimination in the
15 workplace?

16 MR. RASIN: What employee?

17 Q Lasina Ahmad.

18 Did Lasina Ahmad complain about
19 discrimination in the workplace?

20 A To me?

21 Q Yes.

22 A No.

23 Q Did she complain to Human Resources about
24 discrimination in the workplace?

25 A I don't know.